

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

TEJA RAVI, *et al.*,

Plaintiffs,

v.

THE UNITED STATES,

Defendant.

No. 20-1237
(Judge Armando O. Bonilla)

JOINT STATUS REPORT

Pursuant to the Court’s Discovery Scheduling Order (ECF 79), the parties hereby submit this status report regarding the status of discovery.

Defendant makes the following representations:

Initial Disclosures. Plaintiffs requested a one-week extension on the exchange of initial disclosures, so the parties exchanged their initial disclosures on April 2, 2025. Defendant identified eight individuals likely to possess discoverable information—the three special agents that ran the University of Farmington operation and the five named plaintiffs. Plaintiffs listed 120 individuals on their initial disclosures, including the current and former Secretaries of the Department of Homeland Security, although many of the other entries were listed as “name unknown.”

Discovery Requests. Defendant served its first requests for production (1–20), and first interrogatories (1–10) on plaintiffs on April 2, 2025. Plaintiffs’ responses to these requests are currently due May 2, 2025. Plaintiffs served their first requests for production (88 requests including the separately identified subparts), and first interrogatories (1–23) on April 3, 2025. Defendant’s responses to these requests are currently due May 5, 2025.

Plaintiffs make the following representations:

Initial Disclosures. Plaintiffs requested a one-week extension on the exchange of initial disclosures, Defendant agreed, and the parties exchanged their initial disclosures on April 2, 2025. Defendant identified only three individuals, other than the named plaintiffs, likely to possess discoverable information. Plaintiffs have always known two of these individuals as University officials—Ali Malani, the President of the University, and Carey Ferrante, the Director of Admissions. However, Defendant states that these are just aliases and will not provide their actual identities, stating that they are special agents. The Defendant has only provided the identify of one witness, Stephen Webber, besides the named Plaintiff. Although listed as special agent, this is allegedly his actual identity. Plaintiffs provided 120 witnesses on their initial disclosures, including dozens of students.

Discovery Requests. Defendant served its first requests for production (1–20), and first interrogatories (1–10) on plaintiffs on April 2, 2025. Plaintiffs’ responses to these requests are currently due May 2, 2025. Plaintiffs served their first requests for production (1-11, including specific subparts), and first interrogatories (1–23) on April 3, 2025. Defendant’s responses to these requests are currently due May 5, 2025. Defendant has not objected to Plaintiff’s use of subparts for document requests.

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April 3, 2025

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